

From: [Scott Jones](#)
To: [Miller, Gary](#)
Cc: [Walters, Donn](#); [Sanchez, Carlos](#); [Leos, Valmichael](#); [Jennifer Ronk](#); [Jackie Young](#); [Bob Stokes](#)
Subject: RE: Answers to Questions Including Schedule for April fo San Jacinto River Waste Pits
Date: Thursday, March 31, 2016 4:52:30 PM
Attachments: [removed.txt](#)

Hi Gary-

Thanks for answering those questions for Jackie and sending them to me. I'd be happy to place these on our webpage. One thing I note is that in your answer to Question I.d. you reference a fingerprint analysis summary. Can you send that summary to me? Or can you edit the answer so that it does not refer to it? As soon as you get back to me with an edited version or the fingerprint summary, I can get our web person to post. Please do get back to me as soon as you can due to the lead time.

This does bring up a very serious question that I and others, who don't think containment is the correct remedy based on the current information, have about the efficacy of the temporary cap to eliminate the pathway via the food chain. In your answer to question III.a., you state that the use of gravel and finer material serves to function to prevent migration of paper mill waste through the cap. I can't disagree that is the intent and perhaps it is working. For sake of argument, let's say that the cap is preventing physical migration of waste.

However, can the EPA state unequivocally that the cap is preventing the movement of dioxin up into the food chain? The PRPs state that the cap has eliminated that pathway, but I don't think there is evidence that anyone can make such a claim. Your answer to question VI. A. speaks to the limitations of fish tissue sampling. In the absence of some real data to refute it, my assumption is that dioxin is currently available to the food chain given that the cap is not solid and this small benthic organisms can get to the waste and then pass it on up the food chain. I honestly don't know what the law says about how EPA needs to treat such a situation, but I think that you should take the same starting position and err on the side of caution when it comes to this pathway.

If, during the December inspection an EPA diver can step off the boat ladder and sink into the waste/sediment with dioxin concentrations of anywhere from 8,000-44,000 ppt, instead of placing his/her feet firmly on rock that was thought to be there, and your inspection team can push your PVC pipes into the waste sludge, certainly benthic organisms can access the waste. Am I wrong in that assumption? How many other deficient areas are there in the NW quadrant where the benthos can start the bioaccumulation process? How many more deficiencies will occur in the estimated 500 years that the cap needs to work? And even in the absence of a deficiencies, can EPA guarantee that dioxin is not accessible to the food chain in the unlined area?

If you would be able to answer these questions for me, I would love to place these on the webpage as well. But for the sake of timeliness so we can get Jackie's questions up there, mine could go up at a later date.

Thanks-
Scott



9746051

Scott A. Jones
Director of Advocacy

sjones@galvbay.org

Phone: 281-332-3381 x 209 | Cell: 713-376-9686 |

Fax: 281-332-3153

www.galvbay.org

17330 Hwy. 3, Webster, TX, 77598



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From: Miller, Garyg [mailto:Miller.Garyg@epa.gov]

Sent: Thursday, March 31, 2016 8:33 AM

To: sjones@galvbay.org

Cc: Walters, Donn <walters.donn@epa.gov>; Sanchez, Carlos <sanchez.carlos@epa.gov>

Subject: Answers to Questions Including Schedule for April fo San Jacinto River Waste Pits

Scott,

The attached file has answers to Jackie's questions after the February meeting; I would appreciate it if you could put this on the GBF website for San Jacinto. FYI, next week starting 4/4/16 there will be a lot of activity at the site including the dive team inspection, pore water sampler placement, and groundwater well installation. More information is in the attached files.

Please let me know if you have any questions on any of this.

Thanks,

Gary Miller

Remedial Project Manager

EPA Region 6 – Superfund Division (6SF-RA)

214-665-8318

miller.garyg@epa.gov

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